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7 Attorneys for Defendant
8 Adobe Systems Inc.

9
10 UNITED STATES DISTRICT COURT
11
12 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

13
14 IN RE: HIGH-TECH EMPLOYEE
15 ANTITRUST LITIGATION

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17 THIS DOCUMENT RELATES TO:
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19 ALL ACTIONS

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Master Docket No. 11-CV-2509-LHK

**DECLARATION OF LIN W. KAHN
IN SUPPORT OF DEFENDANTS'
JOINT OPPOSITION TO
PLAINTIFFS' MOTION TO
EXCLUDE EXPERT TESTIMONY
PROFFERED BY DEFENDANTS**

Date: March 20, 2104 and
March 27, 2014
Time: 1:30 p.m.
Courtroom: 8, 4th Floor
Judge: The Honorable Lucy H. Koh

1 I, Lin W. Kahn, declare as follows:

2 1. I am an attorney with the law firm of Jones Day, counsel for Defendant Adobe
 3 Systems Inc. (“Adobe”) in the above-captioned action. I am admitted to practice law before this
 4 Court. I submit this declaration in support of Defendants’ Joint Opposition to Plaintiffs’ Motion
 5 to Exclude Expert Testimony Proffered by Defendants. As an attorney involved in the defense of
 6 this action, I have personal knowledge of the facts stated in this declaration and if called as a
 7 witness, I could and would competently testify to them.

8 **Deposition Testimony**

9 2. Attached hereto as **Exhibit 2** is a true and correct copy of transcript excerpts from
 10 the November 18, 2013 deposition of Edward Leamer.

11 3. Attached hereto as **Exhibit 5** is a true and correct copy of transcript excerpts from
 12 the December 19, 2013 deposition of Edward Leamer.

13 4. Attached hereto as **Exhibit 6** is a true and correct copy of transcript excerpts from
 14 the December 9, 2013 deposition of Lauren Stiroh.

15 5. Attached hereto as **Exhibit 7** is a true and correct copy of transcript excerpts from
 16 the December 10, 2013 deposition of Elizabeth Becker.

17 **Expert Reports**

18 6. Attached hereto as **Exhibit 1** is a true and correct copy of Edward Leamer’s
 19 October 28, 2013 Merits Report, with Exhibits A and C, in redacted form pursuant to a pending
 20 motion to seal (*see* Dkt. Nos. 577, 581–9 (Redacted), and 581–10 (Unredacted); 577–37
 21 (Redacted), and 577–38 (Unredacted); 577–41 (Redacted), and 577–42 (Unredacted)).
 22 Declarations in support of sealing were filed at Dkt. Nos. 575, 576, 578, 579, 580.

23 7. Attached hereto as **Exhibit 3** is a true and correct copy of the December 6, 2013
 24 Supplement to David Lewin’s Report.

25 8. Attached hereto as **Exhibit 4** is a true and correct copy of Edward Leamer’s
 26 December 11, 2013 Merits Reply Report in redacted form pursuant to a pending motion to seal
 27 (*see* Dkt. Nos. 577, 581–11 (Redacted), and 581–12 (Unredacted)). Declarations in support of
 28 sealing were filed at Dkt. Nos. 575, 576, 578, 579, 580.

